

EXHIBIT E

Duane Priddy, Ph.D.

Page 1

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

IN RE: ETHICON, INC., PELVIC)	
REPAIR SYSTEM PRODUCTS)	Master File No.
LIABILITY LITIGATION)	2:12-MD-02327
THIS DOCUMENT RELATES TO THE)	MDL 2327
FOLLOWING CASES IN WAVE 1 OF)	JOSEPH R. GOODWIN
OF MDL 200:)	U.S. DISTRICT JUDGE
-----)	
HARRIET BEACH)	
v.)	CIVIL ACTION FILE
	No. 2:12-CV-00476
ETHICON, INC., et al.)	
-----)	
SHARON BOGGS, et al.)	
	CIVIL ACTION FILE
v.)	No. 2:12-CV-00368
ETHICON, INC., et al.)	
-----)	
JUDITH BRUHN, et al.)	
	CIVIL ACTION FILE
v.)	No. 2:12-CV-00888
ETHICON, INC., et al.)	
-----)	
JANICE COLONNA)	
	CIVIL ACTION FILE
v.)	No. 2:12-CV-01274
ETHICON, INC., et al.)	
-----)	
MARY F. CONE)	
	CIVIL ACTION FILE
v.)	No. 2:12-CV-00261
ETHICON, INC., et al.)	
-----)	
SANDRA CYRUS)	CIVIL ACTION FILE
v.)	No. 2:12-CV-01283
ETHICON, INC., et al.)	
-----)	

Videotaped Deposition of DUANE PRIDDY, PH.D.
March 8, 2016

Duane Priddy, Ph.D.

Page 103

1 **A.** I served as a consultant on a project
2 several years ago involving Kugel mesh and at that
3 point I received a mesh sample, but I don't recall
4 actually evaluate -- or testing it.

5 BY MR. HUTCHINSON:

6 **Q.** Do you know what the chemical composition
7 is of the Kugel mesh?

8 **A.** Yes, it was a polyester.

9 **Q.** It wasn't Prolene, correct?

10 **A.** No.

11 **Q.** Doctor, you will agree that Prolene has a
12 chemical composition difference compared to
13 polypropylene?

14 **A.** Absolutely, yes. Compared to what?

15 **Q.** Compared to polypropylene. Polypropylene
16 and Prolene are chemically different, aren't they,
17 sir?

18 MR. JACKSON: Objection, form.

19 **A.** Prolene meshes are polypropylene.

20 BY MR. HUTCHINSON:

21 **Q.** Doctor, as a materials scientist, would
22 you agree that Prolene has a different chemical
23 composition compared to pure polypropylene?

24 MR. JACKSON: Objection, form.

Duane Priddy, Ph.D.

Page 104

1 **A.** It's got stabilizers and additives, yes.

2 BY MR. HUTCHINSON:

3 **Q.** Prolene and polypropylene are not
4 identical, are they?

5 **A.** Prolene is polypropylene with additives.

6 **Q.** And pure polypropylene is not identical to
7 Prolene, correct?

8 MR. JACKSON: Objection, asked and
9 answered.

10 BY MR. HUTCHINSON:

11 **Q.** Pure polypropylene?

12 **A.** Because pure, with no additives, is
13 different than a formulation with additives, yes.

14 **Q.** And Ethicon's product is a formulation
15 with additives, correct?

16 **A.** That's correct. All polypropylene
17 products contain additives. They have to.

18 **Q.** But they are different polymers?

19 **A.** Polymer is the same.

20 **Q.** Doctor, what medical products are you
21 designated to give opinions about?

22 **A.** You mean in legal cases? I've done
23 consulting.

24 **Q.** No, in the deposition that you are here

Duane Priddy, Ph.D.

Page 174

C E R T I F I C A T E

G E O R G I A :

H E N R Y C O U N T Y :

I hereby certify that the foregoing deposition was reported, as stated in the caption, and the questions and answers thereto were reduced to the written page under my direction; that the foregoing pages 1 through 168 represent a true and correct transcript of the evidence given. I further certify that I am not in any way financially interested in the result of said case.

Pursuant to Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure:

I am a Georgia Certified Court Reporter. I am here as an independent contractor for Golkow Global Litigation Services.

I was contacted by the offices of Golkow Global Litigation Services to provide court reporting services for this deposition. I will not be taking this deposition under any contract that is prohibited by O.C.G.A. 15-14-37 (a) or (b).

I have no written contract to provide reporting services with any party to the case, any counsel in the case, or any reporter or reporting agency from whom a referral might have been made to cover this deposition. I will charge my usual and customary rates to all parties in the case.

This, the 9th day of March, 2016.

MAXYNE BURSKY, CCR-2547